

Attorneys for Defendant
FOUR CORNERS AUTOMOTIVE
SERVICE, INC., d/b/a FOUR
CORNERS UNION 76

STIPLULATION REQUESTING EXTENSION OF
TIME OF DEFENDANT TO RESPOND TO
PLAINTIFF'S COMPLAINT AND THE
PARTIES' INITIAL DISCLOSURES (CIVIL L.R. 6-2)
(PROPOSED) ORDER

1 extension sought or granted in the case. In making the original stipulation, the parties
2 expected they would have ample time to conduct a joint site inspection and settle the case or
3 afford defendant time to file its responsive pleading. The parties scheduled a joint site
4 inspection for March 2, 2018. From defendant's perspective, its primary purpose for the joint
5 site inspection was to demonstrate to plaintiff's counsel that defendant completed all repairs it
6 identified in the CASp inspection and report it provided to plaintiff. Understandably,
7 plaintiff's counsel and experts want to personally view the changes and ensure that no
8 disability access barriers remain. However, at plaintiff's request and due to an availability
9 problem of the plaintiff's expert, the parties cancelled the inspection. Defendant's counsel
10 then contracted the flu, which deferred the setting of a new joint site inspection date, among
11 other things. The parties now have scheduled the case for the joint site inspection on March
12 22, 2018. Under the Court's Scheduling Order for this case, the last day to complete the joint
13 site inspection will be March 14, 2018; the initial disclosures were due March 7, 2018. The
14 parties assert that the requested extension of time should be sufficient to either allow the
15 parties to resolve the case or allow defendant adequate time to file its responsive pleading and
16 complete the initial disclosures.

16 Dated: March 12, 2018

HOOY & HOOY
A Professional Law Corporation

18 /s/ Robert J. Hooy
19 ROBERT J. HOOY, ESQ., Attorney for
20 defendant FOUR CORNERS AUTOMOTIVE
21 SERVICE, INC., d/b/a FOUR CORNERS
22 UNION 76

22 Dated: March 12, 2018

ALLACCESS LAW GROUP

24 /s/ Irene Karbelashvili
25 IRENE KARBELASHVILI, ESQ.,
26 attorney for plaintiff JOHN RODGERS

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ORDER AS MODIFIED

The parties having so stipulated and good cause appearing;

IT IS HEREBY ORDERED that the deadline for Defendant to file an Answer and the parties to complete initial disclosures and the joint site inspection is April 16, 2018, with all dates triggered by that deadline continued accordingly.

IT IS SO ORDERED.

Dated: 3/14/18


United States Magistrate Judge

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/s/ Robert J. Hooy
ROBERT J. HOOY, ESQ., Attorney for
defendant FOUR CORNERS AUTOMOTIVE
SERVICE, INC., d/b/a FOUR CORNERS
UNION 76